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ABSTRACT

This report examines responsiveness of the federally-supported Comprehensive School Reform Demonstration (CSRD) to English language learners (ELLs), highlighting the role of state education agencies (SEAs). By analyzing references to relevant terms (e.g., limited English proficiency, English as a Second Language, Spanish-speaking students, bilingual education, and Title VII) in seven states' CSRD applications and requests for proposals, researchers examined whether those states remedied three CSRD oversights (whether states recognized and moved to remedy unnecessary dichotomization between school reform and the movement to make schools ELL responsive; whether SEAs ever reversed the pattern of first designing a reform and then adapting it to ELLs; and whether SEAs overtly addressed the reality that ELLs fare as poorly in school as any identifiable population). Results indicate that an opportunity to remedy CSRD oversights regarding ELLs was largely missed when states did not consider them explicitly as they formulated CSRD strategies. SEAs were ELL responsive in CSRD planning only through general instructions to include all students. Two appendixes contain references to ELLs and/or programs serving ELLs in various states' CSRD applications and references to ELLs and/or programs that serve ELLs in federal CSRD guidelines to states. (Contains 28 references.) (SM)

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English Language Learners, the Comprehensive School Reform Demonstration Project, and the Role of State Departments of Education

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Northeast and Islands Regional Educational Laboratory

a program of The Education Alliance at Brown University

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EXECUTIVE SUMMARY

After first verifying the hypothesis that federally supported Comprehensive School Reform Demonstration (CSRD) program schools have a disproportionately high English language learner (ELL) population, this report inquires into the responsiveness of CSRD to ELLs, focusing on the role of state education agencies (SEAs). In their roles as coordinators of CSRD implementation within each state, a role that has included soliciting and judging school CSRD applications, SEAs have had a central role in CSRD. By manually chronicling and analyzing every reference to "Limited-English-Proficiency" (LEP), "English Language Learner" (ELL), "English as a Second Language" (ESL), "English for Speakers of Other Languages" (ESOL), "language minority," "Spanish-speaking students," "Hispanic students," "bilingual education," "Teaching English to Speakers of Other Languages" (TESOL), "Title VII," and "non-English-proficient" in seven states' CSRD applications and requests-for-proposals (RFPs), we examined whether those states remedied three important ELL-related CSRD oversights.[2]

- We checked to see if states recognized and moved to remedy the unnecessary dichotomization between the school reform movement and the movement to make schools ELL responsive. This included asking if states recognized and sought to remedy the fact that the "research base" supporting most CSRD models did not include testing the models with ELLs (risking a mismatch between school plans and ELL needs).
- We checked whether SEAs ever reversed the typical pattern of first designing a reform and then adapting it to ELLs to instead adapt a program for a broader audience that originated as an initiative for ELLs. For example, we checked for evidence that SEAs had tied CSRD to ideas and programs from Title VII, Migrant Education, or other programs initially designed for ELLs.
- Finally, we considered whether SEAs overtly addressed the current reality that ELLs fare as poorly in school as any identifiable population there and, relatedly, whether they indicated any capacity/willingness to learn from ELL education success stories that might emerge at schools undertaking comprehensive reform.

In the main, only the last problem, the SEA-as-learning-organization, originates at the SEA level. Our question was mostly whether problems for ELLs originating elsewhere were overtly recognized by the SEAs and responded to. Our guiding premise turned the old 1960s' slogan into a question: If SEAs are not part of the solution, are they part of the problem? According to the document record, SEAs by and large did not address the three CSRD oversights alleged above, at least not when they were originally rolling out their CSRD programs. Rather, to the extent SEAs were ELL responsive in their CSRD planning, they were so through general instructions to include *all* students, through unelaborated upon promises that schools not exclude ELLs from their comprehensive reform plans, and perhaps through actual practices that had little direct linkage to the formal plans we scrutinized.

While the rest of this report clarifies how CSRD has overlooked ELLs, explains our methodology, documents what each of the studied states did say in its application and RFP, and includes brief further analysis of the implications of our findings, our main point is that an opportunity to remedy some CSRD oversights in reference to ELLs was largely missed when states did not think of them explicitly and in depth as they were formulating their CSRD strategies.[3] In missing this opportunity, SEAs were no more nor less "guilty" of failing to adequately accommodate ELLs than the long list of other educational stakeholders who have created the *status quo*, nor were they exceptional.

MAKING THE CASE THAT CSRD OVERLOOKS ELLS:

ELL student enrollments are growing rapidly in nearly every state across the country. According to the National Clearinghouse on Bilingual Education (NCBE), 41 states in 1996-1997 had more than 5,000 enrolled ELLs and 38 had more than 1% ELL enrollment. NCBE estimated that there would be more than 4.1 million enrolled ELL students in U.S. schools by 1999-2000, a 104% gain since 1989, constituting about 9% of the total national K-12 enrollment.[4] While there is ample evidence that the number of ELLs in schools is growing and will continue to, there is not corresponding evidence that schools are serving ELLs well or that services are improving. Though "immigrant" is an imperfect proxy for ELL, former U.S. Undersecretary of Education Dr. Gene Garcia (1998:vii) noted that 66% of immigrant students drop out of school (as compared to 33% of Hispanic students and 10% of non-Hispanic whites). More specifically, according to the National Center for Educational Statistics, in 1995 those who had "difficulty speaking English" constituted 5.3% of the total population of 16 to 24 year-olds, but constituted 44.3% of dropouts. That was an increase over 1992 when 39.7% of dropouts were English language learners (and ELLs constituted 5.1% of all 16 to 24 year olds).[5]

Despite ELLs' demographically growing importance, according to Stringfield, *et al.* (1998), none of the popular comprehensive school reform models were designed specifically with English language learners in mind.[6] As Dr. Warren Simmons, the Director of the Annenberg Institute for School Reform at Brown University, explained at a recent conference, "Many models started with a generic student and a generic community in mind."[7] That is, the models aim(ed) for the middle, for the "typical" student. Since CSRD (a.k.a. 'Obey-Porter') was initially funded with $145 million made available as part of the FY 1998 Labor-HHS Education Appropriations Act, the program has encouraged schools participating in the program to adopt externally developed school reform models as the centerpiece of their reform efforts. Thus, though the findings of Stringfield *et al.* and Simmons were directed more broadly at the field of comprehensive school reform writ large, they apply centrally to the CSRD program.

The first of the nine federally required components of the CSRD program insists that CSRD schools use effective, research-based methods and strategies. So far the vast majority of "proof" assembled to demonstrate the research effectiveness of externally-developed comprehensive school reform models has not included ELLs, though some evidence is slowly emerging (e.g., Wilde, *et al.* [1999]). In other words, SEAs and schools are making an untested assumption when they assure themselves that the research base supporting models means those models accommodate well the needs and proclivities of ELLs. They *may*, but the evidence that they *will* has largely not been assembled. Thus, also lacking are case histories of how models can be modified to be ELL-responsive (here again Wilde, *et al.* [1999] is an exception).

It is telling that none of the New American Schools models nor the CSRD models described in the Northwest Regional Educational Laboratory's catalogue of models has origin in Migrant Education, Title VII, or any similar program created specifically to serve ELLs.[8] Despite strong examples of whole schools benefiting from strategies that were specifically created to be ELL responsive—e.g., the International High School (Walqui 2000:154-174)—the comprehensive school reform movement at the turn of the millennium is not consciously trying to "scale up" any of those.[9] Dr. Tamara Lucas, who has a long record of working with and studying English language learners, noted, "If English Language Learners are going to benefit from reforms then they have to be involved in those reforms."[10]

In carrying out our study, we were aware that the label "ELL" is hazardous in some ways because within its descriptive purview are students with a broad range of language backgrounds, school and

literacy experiences, and personal and family histories. According to differing racial, ethnic, and socioeconomic identities, the "welcome" accorded ELLs in schools varies. For example, the school readiness of a Mandarin Chinese-literate son of a Taiwanese immigrant professor and the school-site response to that student will likely differ from both the readiness of and response to, say, a Creole-speaking, little-schooled immigrant Haitian teenager. Indeed, because of the intra-group heterogeneity of ELLs, schools, districts, and SEAs can almost always point to the success of some of their ELL students. This can obscure the fact that many of their ELLs are not faring well and it can unfairly suggest the problem for those poor-performing ELLs is only those students themselves.

For two reasons, however, we hold onto the "ELL" focus/label. First, Title I and other programs have called for disaggregation of ELL school performance data and from that data it is clear that whatever the intra-group diversity, in aggregate ELLs fare comparatively poorly in U.S. schools. In a national educational environment purportedly devoted to educating *all* students to high standards, "ELL" too frequently remains a modifier describing those students who will not reach those standards. Second, with the logic that an unaltered school program is in itself discriminatory to those without full English proficiency, the "Lau Remedies" laid out by the U.S. Supreme Court's 1974 ruling in *Lau v. Nichols* require states to make special accommodation for ELLs in their schools. It follows that, given ELLs' official status as group meriting explicit accommodation, explicit plans for whole-school change (e.g., CSRD plans) should include the explicit plans for ELLs.

Nonetheless, there seem to be two unnecessarily disparate dominant considerations in contemporary American schooling—how to reform schools for improved student achievement and how to help schools respond to increasing demographic diversity (diversity among students and parents, but, unfortunately, not among educators).[11] Because these are conceptualized as separate issues, the concerns of ELL education are often not on the table when concerns regarding comprehensive school reform are being broached (except as part of broad and non-specific language promising responsiveness to "all" students). As Miramontes, *et al.* (1997:69) describe this dilemma, "The typical approach to program planning for English second language learners is to relegate the decision making to special programs people and to view the needs of these students as peripheral to the total school program." Yet these ELL-serving programs often are not only "special" but marginal too (Grey 1991) and they too are in need of reform if their inadequate outcomes are to be remedied.

The central task of this document is not to ask whether ELL students are being served adequately by "special" programs in the seven states studied, *per se*, or even whether they are being served well at the 196 CSRD schools that are within these states. Rather, we ask whether the particular needs and capabilities of ELLs are part of the comprehensive school reform conversations in those states and, more specifically, whether they figured significantly in those states' recent CSRD planning. Our review covers the initial CSRD state applications and SEA-developed RFPs distributed to schools for Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont.

There are many important questions to ask regarding school reform and responsiveness to ELLs, but our inquiry builds from Dentler and Hafner's (1997) finding that improved and sustained ELL achievement requires not just adequate awareness of ELL concerns at the classroom level, but also an awareness of and responsiveness to ELL concerns at higher policymaking levels. Dentler and Hafner's analysis found school and district administrators' understandings of ELLs needs and circumstances to be correlated with ELLs academic achievement, the better their understanding the higher ELL students' achievement. Griego-Jones (1995) echoed their point, noting that effective responsiveness to newcomer students requires system-wide buy-in to proposed learner-responsive adaptations. We are extending their points to include the SEA level because Beck and Allexsaht-Snider's (in press) research details how an SEA can consciously impede district and school level responsiveness to ELLs. Also Fink (2000) notes that innovative schools that operate in larger

traditional policy climates (i.e., with static district and SEA leadership)[12] ultimately lose their innovativeness, returning to a traditional equilibrium. Because the traditional school equilibrium for ELLs typically translates into ELLs' disadvantage, it follows that in the absence of new thinking and new structures at the SEA level, in this case new ELL-responsive structures tied to CSRD, one can expect the diminution of any improved responsiveness to ELLs that might have been created at the classroom and CSRD school levels. In other words, school and district responsiveness to ELLs is not easily sustained without SEA-level understanding and support.

To be sure, such understanding and support can be created if and when SEAs learn from school and district successes, but then there should be evidence of mechanisms for such learning. Lusi (1997) notes that most SEAs are traditionally structured with multiple and fixed layers of hierarchy and vertical lines of communication. While endorsing the idea that SEAs become learning organizations, she explains that SEAs' typical organizational structures inhibit organizational learning and change. It follows that if those portions of SEAs concerned with CSRD need to learn new habits to better accommodate ELLs but are not well-positioned for such learning, then the current SEA organizational *status quo* will persist, perpetuating ELLs continuing relative disadvantage.

While it may first seem odd or even unfair to focus on SEAs when describing inadequacies of CSRD *vis-à-vis* ELLs because the program has federal and not state origin and because the models that overlook ELLs (or that have not been "proven" effective with ELLs) are also outside SEAs specific purview[13], there are a few key SEA roles in CSRD worth remembering. First, as authors of the RFPs read by and responded to by applicant schools, SEAs helped set the initial tone for how schools in their state would respond to CSRD, for how schools would understand what they were expected to do. Moreover, as Maine has amply demonstrated (Hamann, *et al.* [2000]), SEAs have had wide scope to add requirements and shape implementation of CSRD within their states. Second, as the coordinators of the grant solicitation and grant review processes, and as the ultimate authorities regarding what school reform models would or would not be implemented in their CSRD schools, states have had important decision-making power in relation to the world of model providers. That is to say, SEAs have been positioned in the CSRD process to strongly influence the market of CSRD models, influencing both which schools could "buy" models and which models were available to be bought. Model providers respond to market forces, but SEAs created no market demand for ELL-program-originating or ELL-responsive models. No demand, no supply.

Nonetheless, SEAs did direct CSRD funds to schools with proportionally high ELL enrollments. As Table 1 makes clear, CSRD schools in our region enroll a large and disproportionate number of ELL students. (Compare columns 2 and 4 in Table 1 below.) ELL enrollment at CSRD schools in the region average 12.7%, in comparison to 5.4% ELL enrollment in all the region's schools (including CSRD schools). While the 123,612 students enrolled at CSRD schools in the seven states represent 2.5% of total K-12 public enrollment in the region (i.e., about 1 in 40 students in the region attends a CSRD school), the 15,719 ELL students in the region's CSRD schools represent 5.7% of the total ELL student population (i.e., about 1 of every 17 ELL students in the region is at a CSRD school).

Table 1: ELL enrollment in Seven States' CSRD Schools[14]

State (and number of CSRD schools as of 9/00)	Statewide ELL enrollment (and percentage)	State-wide total K-12 enrollment	ELL enrollment in CSRD schools in state (and percentage)	Total enrollment at CSRD schools in state (and as percentage of state's total)
Connecticut (25)	19,811 (3.6%)	544,657	1,534 (11.3%)	13,638 (2.5%)
Maine (11)	2,518 (1.2%)	212,986	59 (0.9%)	6,608 (3.1%)
Massachusetts (52)	45,325 (4.7%)	964,000	3,401 (13.8%)*	24,716 (2.6%)*
New Hampshire (6)	2,089 (1.0%)	206,783	3 (0.1%)	2,417 (1.2%)
New York (86)	195,320 (6.8%)	2,852,000	9,884 (14.3%)	69,331 (2.4%)
Rhode Island (7)	7,739 (5.0%)	154,785	713 (16.7%)	4,275 (2.8%)
Vermont (9)	894 (0.9%)	105,106	125 (4.8%)	2,627 (2.5%)
Regional totals (196)	273,696 (5.4%)	5,040,317	15,719 (12.7%)*	123,612 (2.5%)*
National totals	3,937,291 (8.4%)	46,743,604	Not calculated	Not calculated

** ELL data from the Grafton Street School in Massachusetts was unavailable, so both the Massachusetts and Regional totals are undercounts by one school.*

While assembling the data for Table 1, we found that twenty-four CSRD schools in New York, Connecticut, Massachusetts, and Rhode Island had ELL enrollments exceeding 25%, and four even exceeded 40%. Vermont had two CSRD schools with more than 18% ELL enrollment. At these schools at least, ELL responsiveness would need to be a central CSRD priority, and starting a conversation about whole school reform with the question, "what do ELL students need?",would be appropriate. Exceptionally, Maine's ELL enrollment at its CSRD schools was slightly below state average, and New Hampshire's six CSRD schools enrolled just three of the 2,089 identified ELL students in that state, so the issues there were different.[15] In New Hampshire it seems pertinent to ask how and why CSRD resources have largely bypassed ELLs.[16] For Maine, the answer is that there are fewer ELL students at the high school level (where all its CSRD resources are concentrated) and no schools were funded in Portland where there is a higher ELL population.

Methodology

Noting that most CSRD model providers did not initially target ELLs in their model design,[17] we designed our study to see whether SEAs had recognized this oversight and remedied it within their state CSRD funding proposals and RFPs or whether they too had missed an opportunity to overtly assure that CSRD was specifically responsive to ELLs. Because, as an early step in the rollout of CSRD, each state was required to have their CSRD implementation plan approved by the U.S. Department of Education, we decided that those SEA proposals were a good place to look for the presence or absence of overt consideration of ELLs. With U.S. Department of Education approval in hand, states distributed RFPs to schools and districts. Because those RFPs were central formal communiqués to schools of SEAs' expectations and understandings regarding CSRD, those RFPs were also important sources of data. These two texts (per state) are artifacts of policymaking conversations, providing a partial record of what was considered and a specific record of the ideas that were approved. In our analysis we decided to do a text review of each state CSRD application and RFP, catching all references to ELLs and then categorizing each reference as to whether it

referred to ELLs "concretely" or "peripherally."[18] Only Rhode Island's and Massachusetts' plans included "concrete" references to ELLs, i.e., references that articulated expectations of planning and school and/or district data analysis that was specifically responsive to ELLs.[19] The list of references from each state and our classification of them are reproduced in Appendix A. Looking for ELL references, we also scrutinized federal guidelines to states regarding CSRD. (See Appendix B.) Once we realized that the two New York texts had virtually no references to ELLs (though New York hosts more than two thirds of the ELLs in our region), we looked at that state's initial CSRD state evaluation plan and found a much richer source of ELL references (see Appendix A). Because of Massachusetts' comparatively high ELL enrollment, we also considered that state's continuation of CSRD funding application. (Massachusetts CSRD schools were required to respond to this before second year funds would be disbursed to them.)

Because Regional Educational Laboratories (RELs) are charged with conducting applied research within their regions, reflecting our regional responsibilities to the Northeast and Islands, we selected states based on whether they were in our regional jurisdiction and whether they had a formal CSRD program. (This second condition meant for the exclusion of the U.S. Virgin Islands, which, though in our region, receives only a CSRD block grant.) Originally, we intended to include all other states and islands in our region, but then we decided to drop Puerto Rico from the inquiry because the issue of ELL accommodation is very different there with the primary language of schooling being Spanish.[20] Thus our study includes seven states, four with substantial urban ELL populations (New York, Connecticut, Massachusetts, and Rhode Island) and three with decidedly smaller but quickly growing ELL populations (Vermont, New Hampshire, and Maine).

Vermont, which in 1998-99 counted only 894 ELLs, is in the process of developing ELL-sensitive performance-based assessment instruments and strategies. According to a colleague who is working on that project, many ELL students in Vermont are adopted immigrant children growing up in English-speaking homes. Wortham (in press) has a forthcoming paper that documents the contradictory and ultimately inadequate responsiveness of a high school in one of the northern New England states to its growing ELL population. That school, near a food processing plant that has attracted Mexican and Mexican-descent workers, is now a CSRD school.

In contrast to the novelty and generally small-scale of ELL enrollments in the northern New England portion of our sample,[21] our regional review also includes New York which for more than a century has practically been defined by being a globally significant locus of immigration. New York City is home to the International High School noted earlier as exemplary for its ELL responsiveness (Walqui 2000). Upstate New York is the most important area within our sample for accommodating families (often Spanish-speaking) involved in migrant agricultural work. Small and large regional cities within our sample (e.g., Bridgeport (CT), Willimantic (CT), Central Falls (RI), Lowell (MA), Lawrence (MA), Portland (ME), Rochester (NY), Buffalo, Providence, Hartford, and Boston) host sizeable ELL populations because of refugee resettlement and/or economic niches attractive and accessible to those not proficient in English.

Despite being concentrated in one corner of the country and selected because of our formal responsibilities to the region, our sample is heterogeneous and includes ELLs whose families came to the region for reasons similar to those occurring elsewhere in the country. With the exception of being a "liberal" portion of the country with state governments that are more traditionally activist than some other regions, we do not expect that our sample differs substantially from other parts of the U.S.[22] Though ELL enrollments in our region are slightly lower than in some other regions, as a final proxy indicator of the relevance of using our region for a study of ELL accommodation, within the jurisdictions of the states studied are the schools, schools districts, SEAs, and universities to which 166 of the 1064 FY 1999 Title VII allocations were directed (15.6%).[23] Title VII is a primary

funding vehicle for special programs to serve ELLs, so Title VII allocations hint at the presence of ELLs in schools, the presence of professionals seeking extra resources for them, and the existence of regionally available expertise regarding ELL-responsive education.

Though through the course of other studies we have visited a number of CSRD implementing schools, we consciously limited our data set (with a few exceptions) to the state enrollment figures, CSRD plans, and RFPs, plus the federal guidelines to states, because our question was not directly about whether some schools were bridging the responsiveness gap. (As noted, once we found few references to ELLs in New York's original documents, we did review some additional data from there because we knew some ELL responsiveness was being required.) Similarly, though we have worked with much of the SEA-level CSRD staff in our region, we did not interview them on this topic for this research because our question was not how much they each know or do not know about educational responsiveness to ELLs. Nor was our goal to personalize any critique embedded in this report. Rather our intent was to see whether the SEA CSRD plan creators felt compelled to bring any ELL instructional expertise they might have to bear for the challenge of CSRD. In other words, did they and the institutions they were part of link the issues of ELL responsiveness and comprehensive school reform in any formal way? Or did they see the issues as separate, like the thousands of administrators, policymakers, model providers, and bureaucrats referenced by Simmons and Lucas at the recent comprehensive school reform conference?

There is a historic dimension to our study. Though CSRD is a relatively new program (first funded in 1998), our primary text data is all from 1998 and, as such, it is a reliable source of circa 1998 thinking and planning, but it is not necessarily a reliable indicator of current SEA perspectives and actions. Surprised by the paltry mention of ELLs in New York's plan, for example, we reviewed some newer documents from there and found a recent level of responsiveness not evident in their initial CSRD documents. We do not think other states have made the adjustments that New York has, but we have not systematically reviewed additional documents from the other six states to confirm this belief.

Reviewing the data

As an exception to the data constraints referred to above (i.e., consideration primarily of the seven state plans and seven RFPs), it is instructive to consider the three-page agenda for the February 18, 2000 U.S. Department of Education sponsored meeting for SEA staff from all over the country. That meeting, entitled *A Workshop for State Education Agency Staff on FY2000 Comprehensive School Reform Demonstration Program Awards*, had two references to ELLs on the formal agenda. The last of nine bulleted topic questions for Breakout Session #1 asked, "How can schools be assisted to prepare school reform plans that address the needs of all students in the school, including students with disabilities and English Language Learners?" The other reference also paired ELLs and students with disabilities. After the five main bullets for Breakout Session #2, under the heading "Other key issues for discussion," the eighth of nine sub-bullets read, "Addressing the needs of students with disabilities and English Language Learners." The references in that agenda resembled most of those we found in the state plans. Like the state plans, the references were few. Like the state plans, those references tended to list ELLs with other groups with whom their only commonality is that the other group(s) also fare comparatively poorly in school. Like in the state plans, consideration of ELLs seemed to be secondary or tertiary, as if there were some invisible script saying: "Think about reform, think about a long list of reform-related concerns and, once you've done that, think about how your reform can be adjusted to accommodate ELLs (and others)." This suggests that *how to do reform* and *who it is for* are divisible concerns, with the first meriting the lion's share of attention.

Looking at the ELL references in the seven state CSRD plans and those states' seven RFPs (see Appendix A), we noted that the majority of references were peripheral references, often including ELLs in lists of "special populations." Several states (MA, NH, and NY) made reference to the Title I rules from 1994 that require disaggregation of ELL student achievement data.[24] While such inclusions illustrate an awareness of federal requirements, without further development they promise only procedural compliance rather than active investigation and resolution of problems ELLs encounter as evidenced by achievement results. Listing the federal requirements without further comment leaves unclear whether SEAs are aware of and actively willing to respond to the special challenges of fair assessment of ELLs. There is a wealth of literature about the hazards of using inappropriate assessment instruments with ELLs and also about why excluding ELLs from standardized assessments is problematic (because it enables schools to be less accountable for ELLs' achievement than other students').[25]

Of the ELL references we found, many were in the CSRD "Continuum of Evidence of Effectiveness" chart and in the list of the nine components of CSRD programs.[26] Both of these sources were provided to the states by the U.S. Department of Education and were simply inserted in the state applications.[27] Except in New York's state-wide CSRD evaluation plan (a document we reviewed after noting the paucity of ELL references in their initial state plan and RFP), there were few ELL references in categories where such references were not already required by federal guidelines.

In none of the applications was an entire paragraph devoted to ELL students, nor was there any assurance that programs created specifically for ELLs would be centrally considered in schools' reform plans. None of the state applications and RFPs included references to the types of programs (ESL, TESOL, bilingual, Title VII) that most commonly are the school programs for ELLs. Federal component #9 for CSRD requires explicit identification of how CSRD funds will be aligned with other federally funded programs at a school, making the absence of references to Title VII more telling. Nor did we encounter any references to the federal emergency immigrant education fund, which also has particular pertinence to the education of ELLs.

Perhaps Rhode Island's and Massachusetts' RFPs could have compelled schools to reference such programs as part of a response. New York's more concrete expectations for schools in its state CSRD evaluation protocol might also compel schools to include these programs in their overall consideration of reform, but such expectations post-date that state's initial CSRD policymaking (as captured in the state application and RFP) and thus presumably also post-date schools' initial CSRD decision-making.

Rhode Island's application and its school and district RFPs dealt with ELL accommodation a little more concretely than other states and the references in its documents seem more deliberate. Whereas the other states only mention that the data should be disaggregated in terms of language minority, for example, Rhode Island also explicitly identified ELLs as a target population for whom the "equity gap" needed to be eliminated (in this case the goal is for equitable achievement outcomes as measured on state-mandated standardized tests). Unfortunately, the ELLs and assessment controversy referenced earlier rears its head here. In current Rhode Island practice, schools exempt many ELLs from taking the state's test. While this is logical because such a test can have an unfair stigmatizing effect on an ELL by mislabeling their language struggles as achievement struggles in a broad variety of academic topic areas, it leaves unresolved the harder issue of how to know whether the equity gap is or is not being narrowed. No guidance to schools or districts on how to solve this problem was included in the state's plan.

Like the rest of the region, New York's application has few references to ELLs (actually one) and that one merely promises compliance with Title I disaggregation of data requirements. The reason we are more optimistic about New York in this report is because subsequent SEA actions have indicated a clear intent for ELL responsiveness. New York's CSRD state evaluation (also reviewed in Appendix A) includes myriad references to ELLs and conveys an overt expectation that schools will act to make ELLs central to their school reform program. The evaluation's "Survey of CSRD Program Implementing Schools" asks ELL-specific questions to measure parent and community involvement (e.g., schools are asked if they have homework hotlines appropriate for ESOL families) and to measure program benchmarks (e.g., schools are asked if supplementary immersion programs have been put into place as part of an academic intervention strategy). Based on this latter evidence, New York is more actively thinking about this segment of the student population than the other states we considered, but the ultimate role of the state's evaluation strategy in guiding CSRD there remains uncertain.

Massachusetts too has also specifically referred to ELLs in its follow-up communications with schools, but in this instance the reference shows more of a continuity of real but modest responsiveness to ELLs, not a growing focus. Item #2 in their continuation grant application asks:

> Describe the components of your CSRD program that were addressed during Year 1 based on your Comprehensive Needs Assessment. How do these components fit together to form a comprehensive design focused on success of all students, including students with disabilities and English Language Learners, in meeting the Massachusetts learning and performance standards?[28]

This directive is consistent with earlier understandings and instructions contained in Massachusetts' application and RFP. There too schools were asked to detail their program's responsiveness to ELLs, but only in the context of explaining their responsiveness to several special populations. Though Massachusetts awarded points for applications that indicated ELL responsiveness, the rubric category in which those points were awarded asks for 11 different categories of information with several of those categories including multiple components. In other words a "good" or even "exemplary" answer could avoid specifying much about ELLs beyond assuring ELL's inclusion. Massachusetts' initial CSRD roll-out was not silent regarding ELLs, but nor was it sufficiently detailed to assure progress on any of the three dilemmas identified at the beginning of this paper.

Connecticut addresses ELLs' lot through CSRD only in insistent but vague assertions that the reform process must serve all students. At the beginning of Connecticut's application, the intent for Connecticut's CSRD implementation to align with its *Nurturing the Genius of Connecticut's Students: Connecticut's Comprehensive Plan for Education 1996-2000* is announced. That plan, as described in the CSRD application, identifies "quality and diversity" as one of "four strategic priorities," while making no specific reference to ELLs. The plan is then described as intended to meet five long-term educational priorities of the Connecticut, four of which include the word "all" (i.e., "All Students," "All Learners," "All Students" [again], and "All Citizens"). Clearly Connecticut's goal, at least as ascertainable from written text, is *not* to exclude, but there is no specific guidance about how to include ELLs. Again, none of the oversights noted at the beginning of this report are specifically addressed or remedied.

Except for a century-plus history of steady if modest immigration from French-speaking Quebec, northern New England historically has not hosted ELLs and even now has a lower proportional ELL presence than most states in the U.S. Thus it is not surprising that Maine's, New Hampshire's, and Vermont's applications contain fewer and less specific references to ELLs than did the CSRD materials we reviewed from other states (though Vermont's two highest proportion ELL

schools—both over 18%—are both CSRD schools). Maine is a misleading exception here because it included the Northwest Regional Educational Laboratories catalog as an appendix to its application. The tally of ELL references in its state application is high, but only two of Maine's references are not from the catalog. That catalog includes several ELL references.

Because Maine received a waiver from the U.S. Department of Education to concentrate its modest CSRD allocation entirely at the high school level in support of a state-sponsored high school reform initiative,[29] a waiver that included exemption from formally tying CSRD to Title I (because Title I is concentrated at the primary level), Maine unwittingly removed a number of ELL students from being recipients of CSRD support. (It follows that there are more ELL students at the primary level, because elementary school students have had fewer years of schooling to learn English. ELLs at the secondary level are predominantly newcomers.) We have written favorably elsewhere (Hamann, *et al.*, 2000) of the ambition and promise of Maine's CSRD program, but in reference to the key concern of this report, that ambition and promise are not substantially responsive to ELLs.

New Hampshire does have one potentially concrete reference to ELLs; with content matching that used by Massachusetts, in its RFP it requests schools to explain how the school's plan will assist "at-risk" students to meet challenging state content and performance standards. "English Language learners" are one specified type of "at-risk" students. However, given the facts that New Hampshire's six CSRD schools collectively enroll only three of the state's 2,000-plus ELL students and that the language of this question exactly matches that found in another state, it seems misleading to characterize this reference as proof that the SEA wanted to assure schools' responsiveness to ELLs. Vermont's two references to ELLs both come directly from the federal guidelines to states. When we approached Vermont's Title VII Coordinator for help obtaining ELL enrollment data, we learned that he had never heard of the CSRD program.

What could be:

The central concern of this report is that what could have happened largely did not. However, that assertion, backed by textual evidence as it may be, does not point to how SEAs could assure that their CSRD programs become more ELL responsive, and it is this second issue which ultimately matters. Thus it seems appropriate for us to try to clarify, at least briefly, what we think could have happened. More importantly, this "could have" account, can also be read as suggestions for how SEAs may consciously try to reshape their CSRD implementation to be more ELL responsive. Activities in New York related to CSRD evaluation are encouraging, but there is a much more hands-on role that is possible that would remedy or at least partially remedy the oversights described at the beginning of this paper.

First, the paucity of ELL references in SEA CSRD plans may reflect a relative lack of expertise on issues of ELL accommodation on the part of those charged with coordinating CSRD efforts at the state level. If that is the case, then the hazard is that, for reasons of lack of knowledge, state personnel are not well-positioned to sustain and "scale up" ELL-responsive reforms. According to this problem diagnosis, the challenge is mainly to develop key personnel's expertise on effective strategies for educating ELLs. With that knowledge base in place, SEA staff would be better positioned to scrutinize school plans for the ELL responsiveness, to encourage ELL responsiveness by district and school personnel, to look skeptically at school plans using models that are not ELL responsive, and to be sources of information regarding how to bridge the unnecessary dichotomy between whole school reform initiatives and the issues of ELL accommodation. Perhaps the challenge is as simple as having SEA personnel read the works of Dentler and Hafner (1997), Miramontes, *et al.* (1997) and others and then acting according to their new knowledge. There is a case history of successful Title VII implementations and other programs in which ELLs have benefited. The LAB at Brown

University (where we work) hosts a website on exemplary bilingual education programs that chronicles some of this case history and from which SEA personnel could learn.[30]

But our very act of raising the politically controversial topic of bilingual education makes us think that probably the challenge of making the school reform movement (including at the SEA level) more responsive to ELLs is more complicated than the straightforward acquisition of new knowledge. Why haven't existing effective practices not become more widely known and in use? At a minimum, there needs to be a mechanism for operationalizing such knowledge. As Lusi (1997) advocates, there need to be conscious intents on the part of SEAs to become learning organizations. There need to be means, for example, for CSRD program implementers to learn from Title VII Coordinators, Migrant Education Coordinators, and other SEA staff who do have expertise in ELL education. There need to be means so that successful school site practices with ELLs are captured, and the essential procedural knowledge of those successes is disseminated with sufficient support for necessary customizations in new sites. None of the state plans included a line or paragraph to the effect that "We recognize that ELL students fare particularly poorly in school and, as such, we are going to ensure that when effective practices for ELLs are developed we will incubate them, learn from them, and change our ways as indicated by our new understanding." As noted already in an endnote citing Wong Fillmore and Meyer (1992), it is both unfortunate and symptomatic of the educational politics of the last thirty years that viable mechanisms to capture and disseminate ELL-responsive procedural knowledge have been consistently undercut. It is telltale that none of the models and practices implemented with ELLs through Title VII, Migrant Education, and multiple other mechanisms have been sources for CSRD models.[31] It is as if there is an assumption among SEA staffs (and at multiple other tiers of the formal education enterprise) that nothing broadly applicable can be learned from effective instruction of ELLs.

Though there are potent and regrettable hazards in this analogy, one way of thinking of ELLs at schools is that they are the "canaries in the coal mine." That is, if there are systemic and fundamental flaws within a school and school system, the deleterious consequences of those flaws will be manifest among ELLs first. Flipping this analogy on its head, a system that keeps the canary healthy, a system in which ELLs learn successfully should be healthy for all, as long as all have access to the same conditions as the proverbial canary. McQuillan (1998) hints at this possibility when he notes, just in passing, that the ESL program at the failing high school he studied for five years was one of the few healthy portions of that school, that it had personalization and a sense of community and educational purpose that the rest of the school both needed and lacked.[32]

As we conducted this research, our biggest "aha moment" was the realization that none of the CSRD models were initially designed with ELLs as the referent. While we do note that some models are adjustable and can serve ELLs and we know that Expeditionary Learning/Outward Bound (ELOB) has used federal comprehensive school reform capacity building contracts to develop ELL or at least Spanish-speaker friendly materials,[33] we find the exclusion of programs originally created for ELLs to be problematic. Why do we never ask what can be learned from effective pedagogies with ELLs that can guide schooling of all students? Knowing that ELL students are a substantial or majority population at many schools, why do we not assume that what works for ELLs should be the starting point for how to restructure those schools? To make this a concrete recommendation to SEAs, SEAs should overtly look for examples of programs that serve ELLs well and add those programs to their lists of models they would like to see schools and districts in their states consider.

One complicating factor in CSRD is the dramatically broad range of models suggested as possible for school adoption. Stringfield, *et al.* (1998) note the diversity among model providers on model's degree of prescriptiveness. (Some models—e.g., Success for All—are highly prescriptive; others—e.g., the Coalition of Essential Schools—specify principles to observe but otherwise

recommend local decision-making for figuring out the "hows" of implementation.) The research on ELLs addresses the issue of prescriptiveness. Miramontes, *et al.* (1997:30) raise an important issue with their finding that in schools which best support linguistically diverse students' academic success, "Staff must be empowered to design a new curriculum, make decisions on the mode of language use, and determine student groupings." Reconciling such research findings is an example of an issue where model providers are interested parties, so SEA-guidance would be useful. None of the state plans we reviewed broached this issue.

However vague and peripheral the references sometimes are, there is an acknowledgement in the plans we reviewed that comprehensive school reform must include ELLs. This is the base condition for bridging the dichotomy between school reform writ large and school accommodation to ELLs. The work needed at the SEA level, and the work that has at best only barely been initiated, is to seize this initial acknowledgement and develop the means and will to assure ELLs a central position as we collectively make schools fundamentally fair and universally successful.

SEAs need to remember their roles as consumers or at least adjudicators in the CSRD process. SEAs have the power to accept or deny a school's CSRD application and thereby to pressure model developers to be more ELL responsive. In a small 1998 survey by the LAB of 16 model providers querying them about their willingness to work in Puerto Rico, 10 said they lacked Spanish language materials or were uninterested for other reasons. If one sidesteps the contentious issues of bilingual education versus English immersion for ELL students and thinks only about federal CSRD Component #6's requirement that CSRD schools actively engage parents and community, one can see how the SEAs silence on requiring models to tend to language issues has left an important stakeholder—the ELL parent—*de facto* excluded from CSRD. Because U.S. schools are designed presuming parental input/collaboration (Valdés 1996), predicting ELL students disadvantage in this instance is unfortunately very easy. SEAs join other entities in having responsibility to ensure that all students—ELL explicitly included—are well served by CSRD-originating changes, the data we reviewed did not illustrate that this challenge was being met.

Endnotes

[2] Some of these terms, notably 'Hispanic,' are not necessarily references to English Language Learners (ELLs). Other of the terms (e.g., limited English proficient) have been criticized because they identify learners by what they do not know. For this review, however, the goal was to be thorough, to catch all possible references to ELLs, however oblique or problematic. As per the federal 'Lau Remedies,' we are using ELL here specifically to refer to those students whose progress learning English (including oral fluency and literacy) is not yet sufficient to avoid interfering with their learning in an unsupported classroom environment. By federal law, schools, districts, and states are supposed to identify all ELLs and assure their access to appropriate modified instruction.

[3] In making this charge, we are aware that we too contributed to this opportunity being missed. Though the LAB was closely involved in the roll-out of CSRD in most parts of the Northeast and Islands region and though the LAB's national specialty area is the education of culturally and linguistically diverse students, we did not systematically press states to explicitly consider ELLs. To the extent this report points to needed new ways of operating, we too are a target.

[4] These state and national data come from a chart entitled "K-12 and LEP Enrollment Trends" available through the National Clearinghouse on Bilingual Education website at: http://www.ncbe.gwu.edu/ncbepubs/reports/state-data/index.htm (December 5, 2000).

[5] These data come from *The Condition of Education 1997, Supplemental Table 4-1*, available on the web at: http://nces.ed.gov/pubs/ce/c9704d01.html (December 5, 2000). Defining dropouts as those not enrolled in school who do not have a high school diploma, these statistics most likely include some immigrants who never entered U.S. schools and thus were not 'failed' by them. Before overgeneralizing this point, however, it is worth remembering that only 45% of school-age ELLs are foreign-born (Garcia 1999) and that according to the same NCES data referenced in the regular text, 22.6% of all dropouts had taken an ESL course, which suggests that a high proportion of ELL dropouts have previous U.S. school experience.

[6] This, however, does not mean some models do not claim responsiveness to ELLs in their literature. The Southwest Comprehensive Center recently published a guide (Wilde, *et al.* 1999) that describes 18 schools successfully implementing 13 CSRD models with ELLs. That guide also describes 10 locally developed ELL responsive school designs. Framing their report, Wilde *et al.* write "[W]hile a number of models have demonstrated success in raising student achievement, thus far most do not address directly the learning needs of ELL populations although a growing number of nationally available models are placing more emphasis on this population" (1999:2). See also the final ELL references in Maine's CSRD application (Appendix A), which are from a verbatim reproduction of the Northwest Regional Educational Laboratory's Comprehensive School Reform model catalogue.

[7] Dr. Simmons was the keynote presenter at a recent conference attended by the lead author of this report. The conference, entitled 'Closing the Achievement Gap at the Secondary Level Through Comprehensive School Reform,' was held in Atlanta December 1-2, 2000. The Annenberg Institute for School Reform at Brown University, the Northwest Regional Educational Laboratory, the Consortium for Policy Research in Education, the Council of Chief State School Officers, and the U.S. Department of Education all co-sponsored the conference.

[8] The Northwest Regional Educational Laboratory's catalogue of comprehensive school reform models can be found at: http://www.nwrel.org/scpd/natspec/catalog/index.html (December 12, 2000).

[9] Wong Fillmore and Meyer (1992) describe how the federal politics of bilingual/second language education in both the 1970s and 80s meant that much of the institutional wisdom about effective programs for ELLs was lost because of the constant reconfigurations of the ELL education support infrastructure. The closure of the Multifunctional Resource Centers in the 1990s is a more recent example of the same story. These disruptions could be one reason for the lack of 'scaling up' of any model that originated with ELL students as its initial focus population.

The National Children's Educational Reform Foundation, Inc., based in Danbury, CT, is, at the time of this writing, seeking to remedy the full exclusion of Title VII-origin programs from CSRD. Their complementary models—Think-kids, Think-parents are powerful, and Think-coach—originate in a Title VII-funded effort with ELLs in Hartford, CT.

[10] Dr. Lucas made this observation while presenting at the 'Closing the Achievement Gap at the Secondary Level Through Comprehensive School Reform' conference that was held in Atlanta December 1-2, 2000. For illustrative examples of her expertise on ELL issues see Lucas (1993, 1997) and Lucas and Wagner (1999)

[11] For more on this point see Miramontes, *et al.* (1997:67).

Endnotes (cont.)

[12] What matters is not just who the leaders are—leaders can change—but rather whether there is stasis in the content and processes of leadership.

[13] There are occasional exceptions to this; for example, the Puerto Rico Department of Education was closely involved in the development of the Puerto Rico State Systemic Initiative (PRSSI), a curriculum reform effort that has been converted into a CSRD model approved for implementation in 15 CSRD schools on the island.

[14] The data assembled in Table 1 come from myriad sources. Most enrollment data is from 1998-99 with the exceptions of New Hampshire, and, in part, Maine, which include 1999-2000 figures. The Maine tallies are a hybrid artificial construction because school-level data was unavailable. To generate the Maine ELL count we multiplied the 1998-99 district identified limited-English-proficient percentage (the latest available) by the 1999-2000 school enrollment tally. Though yielding a tally of only 59, the Maine figure may be an overcount as it is likely that the high school-level proportion of ELL students is less than the district average used for our equation. Counterbalancing this risk are several factors; in locations like Maine historically unaccustomed to identifying limited English proficiency it is probable that many such students are overlooked (with basic interpersonal communication skills [a.k.a. BICs] being misunderstood as cognitive academic language proficiency [a.k.a. CALPs]). Also, with ELL enrollments generally rising, the 1998-99 multiplier is likely smaller than the 1999-2000 figure which would be a more appropriate multiplier if available. The Maine data comes from the Maine Department of Education's website (http://janus.state.me.us/education/enroll/fall/fall00master.htm [January 2, 2001]) and the report "1998-99 Language Minority Student Demographics in Maine Schools" prepared by Maine's Title VII ESL/Bilingual Education Specialist, Dr. Barney Bérubé. That report identifies both the LEP students that the Lau Remedies require to be counted and the larger number of 'language minority' students (i.e., all students whose first language is not English). For our calculations we used only the LEP figures. The New York data also includes one artificially generated figure. The overall ELL population for the state represents an average of the 1997-98 tally and the 1999-2000 tally. New York data came from Ileana Olazagasti at New York Title VII Coordinator Carmen Perez-Hogan's Office [518-474-8775 on 12/15/2000]), as well as http://nces.ed.gov/pubs99/quarterlyjul/3-Elem-Sec/3-esq12-j.html (12/15/00), http://www.nycenet.edu/daa/asr/content/report_viewer.asp?BoroCode=1&LEVEL=220&SCHOOL=101022&PG1=on&PG2=on&PG3=on&PG4=on&PG5=on&PG6=on&PG7=on&PG8=on (12/15/00), and http://www.nycenet.edu/daa/asr/content/report_viewer.asp?BoroCode=1&LEVEL=220&SCHOOL=101022&PG1=on&PG2=on&PG3=on&PG4=on&PG5=on&PG6=on&PG7=on&PG8=on (12/15/00). Connecticut data came from two principal sources—http://www.csde.state.ct.us/public/der/datacentral/edfacts/ef_tables/studnt/ (accessed via http://www.state.ct.us/sde/) and a report prepared for the Connecticut Department of Education by Sarah S. Ellsworth counting the number of ELL students in Connecticut districts. Massachusetts data came from two websites: http://profiles.doe.mass.edu/default.asp?district=0&school=0&flag=0&view=++(12/15/00) and http://www.edweek.com/context/states/ma-facts.htm (12/15/00). New Hampshire data was found at: http://www.measuredprogress.org/nhprofiles/SchEnroll.cfm (12/15/00). Rhode Island data came from: http://www.infoworks.ride.uri.edu/2000/schlist.htm (12/15/00) and http://nces.ed.gov/pubs99/quarterlyjul/3-Elem-Sec/3-esq12-j.html (12/15/00). Vermont data was compiled by combining ELL enrollment tallies provided over the telephone by Vermont Title VII Coordinator Jim McComb (12/18/00) and the enrollment data available on the Department of Education's website: http://crs.uvm.edu/cfusion/schlrpt00/complete.cfm?psid=PS002 (12/15/00).

[15] The New Hampshire data are based on 1999-2000 school-year enrollment information, which can be found at: http://www.measuredprogress.org/nhprofile/SchEnroll.cfm (December 12, 2000).

[16] One answer is that there are no CSRD schools in Concord or Manchester, two cities that between them host approximately two thirds of New Hampshire's ELL enrollment.

[17] Caveats offered in endnote #6 again apply.

[18] See the first paragraph on p. 1 for a full list of the ELL-related terms that we looked for in the applications and RFPs.

[19] New York subsequently demonstrated concrete ELL-responsiveness through its state-wide CSRD evaluation strategy. (See New York in Appendix A.)

[20] However, with a sense that too often Puerto Rico is excluded from U.S. educational research and thus marginalized because of its distinctiveness, we did decide to make sure that the 'Puerto Rico CSRD story' was included in the national collection of research on CSRD. Thus, as a second and separate portion of this project we wrote a report entitled *Lessons and Possibilities: Notes Regarding CSRD in Puerto Rico* (Hamann, *et al. 2000*). That report is separately available from the LAB at Brown.

Endnotes (cont.)

[21] One of the ELL responsive schools noted by Wilde, *et al.* (1999) is the King Middle School in Portland (ME) which has a 22% ELL enrollment. Though using a New American Schools/CSRD model—Expeditionary Learning/ Outward Bound—King is not a CSRD school. Maine has concentrated all of its CSRD funding at the high school level.

[22] Even on this point, because our sample includes New Hampshire which has a decided limit-to-government orientation and the lowest per capita state involvement in schooling (based on state funding of schools) of any jurisdiction in the country, our sample is more akin to the heterogeneity of the rest of the country than one might first think.

[23] This Title VII FY 1999 data can be found at: http://www.ncbe.gwu.edu/obemla/grants/fy1999/vii99.xls (December 7, 2000). It shows that Connecticut received 11 Title VII grants, Maine also 11, Massachusetts 29, New Hampshire 6, New York 101, Rhode Island 5, and Vermont 3.

[24] Rhode Island makes reference to its database on schools and students—called *Information Works!*—that also disaggregates ELL achievement. This disaggregation is in compliance with Title I; whether that was the rationale for it is unclear.

[25] Regarding assessment and ELLs see, for example, Durán (1989), Hamayan and Damico (1991), Saville-Troike (1991), Hamayan (1995), Genesee and Upshur (1996), O'Malley and Valdez-Pierce (1996), Gómez (1998), Lachat and Spruce (1998), and Lachat (1999).

[26] The original Obey-Porter CSRD authorizing legislation included no references to ELLs. However, as one of the few modifications to the legislation's terminology, in the U.S. Department of Education's non-regulatory guidance to states, reference to ELLs was added to Component 2 – comprehensive design with aligned components. (See Appendix B.)

[27] Eighty percent of CSRD funding originates as Title I funding, so Title I requirements apply to CSRD.

[28] Unlike New York's statewide CSRD evaluation protocol, this post-1998 SEA CSRD communiqué from Massachusetts is not reviewed in Appendix A.

[29] See the LAB's forthcoming report "CSRD Roll-out in Maine: Lessons from a statewide case study" (Hamann, *et al.*, 2000) for a detailed analysis of Maine's unique CSRD implementation strategy.

[30] See *Portraits of Success* http://www.lab.brown.edu/public/NABE/portraits.taf (December 8, 2000).

[31] Here we are referring to externally-developed CSRD models, we make no claim regarding the origin of the 'locally-developed' models (i.e., single site models) that steer some schools' CSRD implementation. See also Endnote #9.

[32] As it happens, the school McQuillan studied is now also a CSRD school within our region.

[33] See "Department Awards $8.7 million to Assist Providers of Comprehensive School Reform" (http://www.ed.gov/PressReleases/10-1999/compproviders.html [January 2, 2001]).

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Appendix A:

References to ELLs and/or to programs that serve ELLs in various states' CSRD applications to the U.S. Department of Education

CONNECTICUT			
Section & page #	Description	Peripheral	Concrete
State App. P.8 Line 11	Reference to children with limited English proficiency. Mentioned in item #2 "Comprehensive design with aligned components" in list of 9 components of CSRD programs	√	
State App. P.12 Line 2 from bottom	Reference to bilingual and ESL coordinator monthly meeting as part of Connecticut "Dissemination Strategies"	√	
State RFP P.11 Line 8 from bottom	Reference to children with limited English proficiency. Mentioned in item #2 "Comprehensive design with aligned components" in list of 9 components of CSRD programs	√	
State RFP P.40	Reference to children with limited English proficiency. Mentioned in item #2 "Comprehensive design with aligned components" in list of 9 components of CSRD programs	√	
State RFP P.43 Line 12 from bottom	Reference to language minority composition with respect to student demographics. Mentioned in "Continuum of Evidence of Effectiveness" chart as part of implementation item.	√	
State RFP P.44 Line 8 in 3rd paragraph	Reference to "Spanish speaking community." Mentioned in example #2 of how the "Continuum of Evidence of Effectiveness" might be used.	√	
State RFP P.52 Response to question A-2	Reference to "children with limited English proficiency." Mentioned as example of children that will be enabled to reach challenging academic standards through the coordination of comprehensive education improvement strategies.	√	

MAINE			
Section & page #	Description	Peripheral	Concrete
Appendix B Supporting your model: A Continuum for Effectiveness (Green) P.3 Line 6 from bottom	Reference to language minority composition with respect to student demographics. Mentioned in "Continuum of Evidence of Effectiveness" chart as part of implementation item.	√	
Continuum of Evidence (Orange) P.10 Line 7 from bottom	Reference to dominant language. Mentioned in one of evaluation indicators. The indicator entails the disaggregation, analysis and interpretation of student data by a list of factors – dominant language is part of this list.	√	
Appendix D (Buff) Approved List of National School Reform Models P.21 - 3rd paragraph	Reference to students learning English. Mentioned as part of the student population targeted by the ATLAS communities model.	√*	
Appendix D (Buff) P.65 – 4th paragraph	Reference to English-language learners. Mentioned as part of the student population targeted by the Foxfire Fund model.	√*	
Appendix D (Buff) P. 173 – 3rd paragraph	Reference to Hispanic students. Mentioned as part of the student population targeted by the Math Connections model.	√*	
Appendix D (Buff) P.143 – 3rd paragraph	Reference to English language learners. Mentioned as part of the student population targeted by the National Writing Project Model.	√*	
Appendix D (Buff) P.89 - 3rd paragraph	Reference to Bilingual students. Mentioned as part of the student population targeted by the Onward to Excellence model.	√*	
Appendix D (Buff) P.151 - 3rd paragraph	Reference to English-language learners. Mentioned as part of the student population targeted by the Strategic Teaching and Reading Project model.	√*	

** All of these Appendix D references are considered peripheral, because Appendix D was just the reproduction of the NWREL list of approved models. None of these models were adapted as CSRD models in Maine, though a few Maine CSRD schools had versions of Foxfire from previous non-CSRD-related professional development experiences*

MASSACHUSETTS			
Section & page #	Description	Peripheral	Concrete
State App. Attachment B – Scoring Rubric P.18 Line 2	Reference to English language learners. Mentioned along with Title 1 students and special education students as population that improvement strategy needs to target.		√
State App. CSRD Appendix B – federal Continuum of Evidence Line 6 from bottom	Reference to match between language minority composition at schools where model has worked and applicant school.	√	
State App. CSRD Appendix C – Suggestions for LEA Eval. of CSRD Line 7 in 3rd paragraph (a photo-copy of this page is included as Appendix D in the state RFP)	Reference to English proficiency status. Mentioned as a Title I category for which the assessment of student performance results should be disaggregated.	√	
State RFP P.6 Line 2	Reference to English language learners. Mentioned in list of information to be provided by the schools seeking funds. Mentioned in item #4 "Description of Proposed Programs" as a type of "at risk" population.	√	
State RFP Scoring rubric for School application narrative Line 14	Reference to English language learners. Mentioned as part of item #4 "Description of proposed program." "[I]ndicates how the program will focus on improving teaching and learning and how it will assist all students (including Title I, special education, and English language learners)."		√
State RFP Chart of 9 CSRD components Line 3	Reference to "English Language Learners." Mentioned in item #2 "Comprehensive Design with Aligned components" of CSRD chart to be sent in with school application.	√	

NEW HAMPSHIRE			
Section & page #	Description	Peripheral	Concrete
State App. P.5 Line 7 from bottom	Reference to children who speak English as a second language. Mentioned in passing as an "at risk" population to be considered in reference to local school improvement initiatives. These initiatives were to be compiled in a Resource Guide of promising practices for N.H. educators.	√	
State App. P.14 5th paragraph	Reference to Limited English Proficient status. Mentioned as a Title I category by which the assessment of student performance results should be disaggregated.	√	
State RFP P. 6 Line 3	Reference to English Language learners. Mentioned as an "at risk" population to be addressed in the school application section entitled "Description of Proposed Program's Vision."	√	
State RFP 15th page, Line 17	Reference to English Language learners. Mentioned as part of item #4 in the school application section of scoring rubric.	√	

NEW YORK			
Section & page #	Description	Peripheral	Concrete
State App. P. 8 Line 8 from bottom	Reference to limited-English-proficient status. Mentioned as a Title I category by which the analysis on student progress should be disaggregated.	√	

New York State-wide Evaluation Plan			
Section & page #	Description	Peripheral	Concrete
State Evaluation CSRD draft survey P. 2 – Question 5 (d)	Reference to Limited English proficient students. Mentioned as part of a multiple choice answer to the question "Does the CSRD program encompass the entire school, or does it focus on particular grade levels, subjects or students?"		√
State Evaluation CSRD draft survey P. 11 – Question 47 (n)	Reference to LEP students. LEP students are cited as an example of a special population to be targeted in the professional development area of "instructional strategies."		√
State Evaluation CSRD draft survey P. 13 – Question 54	Reference to parents of LEP students. Mentioned as example of a parent group in the section of questions dealing with parent and community involvement.		√
State Evaluation CSRD draft survey P. 14 – Question 55 (d)	Reference to ESOL families. Mentioned in the section of questions dealing with parent and community involvement. Schools are asked if they have homework hotlines that are appropriate for ESOL families.		√
State Evaluation CSRD draft survey P. 15 – Question 62 (i)	Reference to language immersion programs. Mentioned in the section of questions dealing with goals, benchmarks & assessment. Schools are asked if supplementary immersion programs have been put in place as part of an academic intervention strategy for working with students who have not met the goals & benchmarks.		√
State Evaluation CSRD draft survey P. 16 – Question 63	Reference to LEP students. Mentioned in the section of questions dealing with goals, benchmarks & assessment. Schools are asked if they have developed alternate goals for special populations such as LEP students, etc…		√

RHODE ISLAND			
Section & page #	Description	Peripheral	Concrete
State App. P.2 Line 8	Reference to limited English proficient students. Mentioned in introduction as part of the description of diverse student groups in RI public schools.	√	
State App. P.17 Line 5	Reference to English proficiency. Mentioned in section describing how RI intends to assess performance in terms of making reductions in equity gaps between diverse groups of students. English proficiency students is listed as one these groups.		√
State App. P.18 Line 4	Reference to limited English proficiency. Mentioned in response to application requirement #4. The state's school information database, *Information Works!*, addresses the disaggregation of information for the targeted groups served by CSRD – limited English proficiency is listed as one such target group.	√	
State RFP P.10, Line 2 from bottom	Reference to children with limited English proficiency. Mentioned in the requirements of DISTRICT NARRATIVE question #4 - this group is part of a list of student groups that should be included in a clear district plan for measuring achievement.		√
State RFP P.12	Reference to children with limited English proficiency. Mentioned in scoring key for question #4 above. Explicitly planning for disaggregation of ELL assessment is part of a "strong" answer		√
State RFP P.18 Line 8 and 22	Reference to children with limited English proficiency. Mentioned in SCHOOL NARRATIVE question #4 and in the requirements for this question. This group is part of a list of student groups that should be enabled by the CSRD model to meet RI performance assessments.		√
State RFP Scoring Guide P.8	Reference to limited English proficiency. Mentioned in the requirements of DISTRICT NARRATIVE question #4 - this group is part of a list of student groups that should be included in a clear district plan for measuring achievement.		√
State RFP Scoring Guide P.9	Reference to limited English proficiency. Mentioned in scoring key for DISTRICT NARRATIVE question #4.		√
State RFP Scoring Guide P.16	Reference to children with limited English proficiency. Mentioned in SCHOOL NARRATIVE question #4 and in the requirements.	√	
State Evaluation Application Requirement #4 P.17 Line 11	Reference to English proficiency. Mentioned in section describing how RI intends to assess performance in terms of making reductions in equity gaps between diverse groups of students. Limited English proficiency students are listed as one these groups.	√	

VERMONT			
Section & page #	Description	Peripheral	Concrete
State App. P.9 Line 9 from bottom	Reference to children with limited English proficiency. Mentioned in item #2 "Comprehensive design with aligned components" in list of 9 components of CSRD programs.	√	
State RFP 6th page	Reference to children with limited English proficiency. Mentioned in item #2 "Comprehensive design with aligned components" in list of 9 components of CSRD programs.	√	

Appendix B:

References to ELLs and/or to programs that serve ELLs in federal CSRD guidelines to states

FEDERAL GUIDELINES TO STATES			
Section & page #	Description	Peripheral	Concrete
State Guidance & Resources **Guidance on the CSRD** U.S. Department of Education A-2	Reference to LEP children. Mentioned as a group of children that should be enabled, through the coordinated effort of the CSRD legislation and other education improvement initiatives to reach challenging academic standards.	√	
State Guidance & Resources **Guidance on the CSRD** U.S. Department of Education B-1	Reference to LEP children. Mentioned in list of 9 CSRD components.	√	
State Guidance & Resources **Guidance on the CSRD** U.S. Department of Education Appendix B	Reference to language minority composition with respect to student demographics. Mentioned in "Continuum of Evidence of Effectiveness" chart.	√	